

**UNITED STATES BANKRUPTCY COURT
FOR THE
DISTRICT OF VERMONT**

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IN RE:)
Hermitage Inn Real Estate)
Holding Company, LLC.) **Chapter 11**
Debtor) **Case No.: 19-10214 CAB**
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IN RE:)
Hermitage Club, LLC) **Chapter 11**
Debtor) **Case No.: 19-10276 CAB**
) **(Jointly Administered)**
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**MOTION TO ALLOW ADMISSION PRO HAC VICE OF SCOTT A. MCQUILKIN,
ESQ., CO-COUNSEL TO BERKSHIRE BANK**

NOW COMES Elizabeth A. Glynn, Esq., attorney and counselor at law admitted to practice and in good standing in this Court, and respectfully moves this Court for entry of an order, pursuant to Rule 83.1(b) of the Local Rules of the United States District Court for the District of Vermont (the "District Court Local Rules") and Rule 2090-1(b) of the Vermont Local Bankruptcy Rules (the "Local Bankruptcy Rules"), (i) admitting **Scott A. McQuilkin, Esq.** (the "Admittee") pro hac vice to also represent Berkshire Bank in this case; (ii) authorizing the registration of the Admittee for this Court's electronic filing system; and (iii) authorizing the Admittee to rely upon the law offices of Ryan, Smith & Carbine, Ltd. to effectuate electronic filings with the Court until such time as the Admittee's registration to use this Court's electronic filing system has been processed and the Admittee is able to use such electronic filing system.

In support of this Motion, movant relies upon the affidavit (the "Affidavit") of Admittee filed concurrently herewith and respectfully represents as follows:

1. The Admittee is an attorney with the law firm of Hinckley Allen, 28 State Street, Boston MA 02109-1775.

2. The Admittee is admitted to the U.S. District Court for the District of Massachusetts, as well as before the Commonwealth of Massachusetts. He has previously been admitted pro hac vice in the Superior Court for Vermont, as set out in his affidavit.

3. The Admittee has associated with the law offices of Ryan, Smith & Carbine, Ltd. in this case pursuant to District Court Local Rule 83.1(b)(3) and Local Bankruptcy Rule 2090-1(b)(3).

4. This Motion is served upon the United States Trustee, through the ECF system. No case attorney has been appointed, and so has not been served. No further service upon any other parties is required by the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure, the Local Bankruptcy Rules or otherwise and Movant requests that the Court find that sufficient notice has been given under the circumstances.

5. A Certificate of Good Standing (referenced by District Court Local Rule 83.1(b)(2)(D)) is not attached, as such is not required under Local Bankruptcy Rule 2090-1(b) and as admission is sought in the short-term so that Mr. McQuilkin can begin appearing in Hearings, the next of which is set for July 26, 2019. Mr. McQuilkin is already providing his affidavit as to his good standing in his home state. Such Certificate can be supplied if necessary.

Pursuant to Vt. LBR 2090-1, for good cause shown, Elizabeth A. Glynn, Esq. requests that she be excused from attendance at all hearings with Admittee.

WHEREFORE, the Movant respectfully requests that the Court enter an order pursuant to (i) admitting Admittee pro hac vice to also represent Berkshire Bank in the case; (ii) authorizing the registration of the Admittee for this Court's electronic filing system; (iii) authorizing the Admittee to rely upon the law offices of Ryan, Smith & Carbine, Ltd. to effectuate electronic filings with the Court until such time as the Admittee's registration to use for this Court's electronic filing system has been processed and the Admittee is able to use such electronic filing system, and (iv) for Elizabeth A. Glynn, Esq. to be excused from the Local Bankruptcy Rule requiring attendance at all hearings with the Admittee.

Dated at Rutland, Vermont on July 22, 2019.

By: /s/Elizabeth A. Glynn
Elizabeth A. Glynn, Esquire
Ryan Smith & Carbine, Ltd.
P. O. Box 310

Rutland, VT 05702-0310
802 786-1065
eag@rsclaw.com

CERTIFICATE OF SERVICE

I, Elizabeth A. Glynn, Esq., hereby certify that on this date I served a true and correct copy of the Motion to Admit Scott A. McQuilkin Pro Hac Vice, filed through the ECF system, on all parties of record electronically via the Court's CM/ECF System, with no mailed service.

Dated at Rutland, Vermont on July 22, 2019.

By: /s/Elizabeth A. Glynn
Elizabeth A. Glynn, Esquire
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